

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

UNIVERSITAS EDUCATION, LLC,

Petitioner,

v.

NOVA GROUP, INC, as trustee, sponsor, and  
fiduciary of THE CHARTER OAK TRUST  
WELFARE BENEFIT PLAN, et al.

Respondents.

NOVA GROUP, INC, as trustee, sponsor, and  
fiduciary of THE CHARTER OAK TRUST  
WELFARE BENEFIT PLAN, et al.

Petitioner,

v.

UNIVERSITAS EDUCATION, LLC, et al.

Respondents.

No.: 1:11-cv-1590-LTS-HBP

Hon. Laura Taylor Swain

**DECLARATION OF  
ROGER L. STAVIS IN  
SUPPORT OF MINTZ &  
GOLD LLP'S MOTION  
FOR LEAVE TO  
WITHDRAW AS  
COUNSEL TO GRIST  
MILL CAPITAL, LLC**

No.: 1:11-cv-8726-LTS-HBP

Roger L. Stavis, an attorney admitted to practice before this Court, declares the following to be true subject to the penalties of perjury:

1. I am a partner at the law firm of Mintz & Gold LLP ("M&G") and current counsel to Grist Mill Capital, LLC ("GMC"). This declaration is in support of the instant application to be relieved as counsel for GMC.

2. Withdrawal is warranted and necessary because of a fundamental disagreement between M&G and GMC. The attorney-client relationship has become irretrievably broken.

3. On April 8, 2021, GMC, through its principal, sent an email to me and my co-counsel, Kevin M. Brown, further highlighting our disagreement regarding strategy. Based on the contents of the email, it became clear that GMC and M&G cannot engage in meaningful dialogue and are completely incapable of working together constructively with regard to this matter. In the time since April 8, 2020, the attorney-client relationship has only worsened.

4. Pursuant to Rule A.2.b.e of the Individual Practices of Judge Laura T. Swain, proof of service of M&G's memorandum of law is annexed hereto as Exhibit A.

The foregoing is true to the best of my knowledge and belief.

Dated: New York, New York  
April 20, 2021



Roger L. Stavis